

Federal Defenders  
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Eastern District  
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November 1, 2024

The Honorable Pamela K. Chen  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Douglas Noel, 23-CR-320 (PKC)

Dear Judge Chen:

Mr. Douglas Noel is currently scheduled to appear before the Court on November 4, 2024, for a status hearing. He is on bond, residing with his mother and surety in Colorado Springs, and is in compliance with all conditions of release. Defense counsel is in the process of preparing mitigation materials, including meeting with Mr. Noel and his family members in Colorado Springs, and the parties are engaged in ongoing plea negotiations. Additional time is required to submit mitigation materials and for the review of those materials.

In light of the current status of the case, the parties jointly request that the Court continue the status hearing approximately 90 days and that time be excluded under the Speedy Trial Act to allow for the production and review of discovery, plea negotiations, and defense preparation.

Thank you for your consideration.

Respectfully Submitted,

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cc: AUSA Joshua Dugan